

2,4-D

June 4, 1980

MEMORANDUM

SUBJECT: Summary of FIFRA Scientific Advisory Panel Meeting

FROM: Dr. H. Wade Fowler, Jr.
Executive Secretary
FIFRA Scientific Advisory Panel

TO: Deputy Assistant Administrator
for Pesticide Programs

Attached is a summary of the FIFRA Scientific Advisory Panel's recommendations on Subpart D, Chemistry Requirements and Subpart L, Nontarget Insects of the Guidelines for Registering Pesticides in the United States and Data Gaps on 2,4-D. The meeting was held on May 28 and 29, 1980, in Arlington, Virginia.

Attachment
Summary

cc: Mr. Conlon

Summary of FIFRA Scientific Advisory Panel Meeting

The FIFRA Scientific Advisory Panel (SAP) met on 5/28-29/80 in Arlington, VA. The Panel made recommendations to the Agency concerning: (1) Subpart D, Chemistry Requirements and Subpart L, Nontarget Insects, of the Guidelines for Registering Pesticides in the United States and (2) data gaps with 2,4-D. Reports will be submitted by the Panel within the next two weeks on all topics reviewed during the meeting. In summary, the Panel reached the following conclusions:

1. Subpart D, Chemistry Requirements: The Panel expressed serious concern on the adequacy and reliability of Agency microbial bioassays (proposed Section 163.61.7) as diagnostic predictors of genotoxic substances. The Panel recommended adoption of a different battery of tests previously recommended to the Agency on November 30, 1979.
2. Subpart L, Nontarget Insects: The Panel recommended adoption of the document.
3. Data Gaps on 2,4-D: The Panel agreed with the appraisal by Agency scientists relative to requirements for acute toxicity and dermal absorption data. Partial agreement was noted for select neurotoxicity data, metabolism data, and reproduction data. In respect to possible oncogenicity data, the Panel recommended that the Agency attempt to resolve the controversy between the study conducted by Hanson et. al. 1971 and the pathologic interpretation of that study by Reuber 1979 prior to certification that additional oncogenicity studies are required.